

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-20104-CR-BECERRA

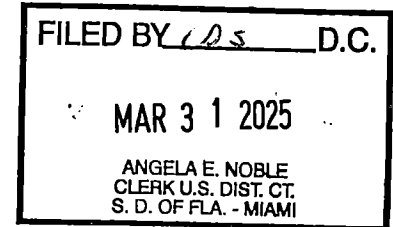
UNITED STATES OF AMERICA,

vs.

FILED UNDER SEAL

WALTER VEINTEMILLA.

Defendant.



REPLY TO UNITED STATES' RESPONSE TO MARCH 13, 2025 ORDER (DE 985)

In its Response to the Court's Order of March 13, 2025 (DE 985), the Government asserts that "The new material in Productions 18-19 and 21 amounts to 614 pages."¹ (DE 985, p. 1). Contrary to that representation, many additional items, well beyond 614 pages, have been identified that were not previously produced to Defendants herein, as detailed below. Indeed, the Discovery Coordinator herein, Russell M. Aoki, has confirmed that "In total, for Productions 18, 19, and 21, there are 1,681 files that were confirmed as not previously produced" *See*, March 27, 2025 *Ex-Parte* Declaration of Russell M. Aoki, The Coordinating Discovery Attorney, Describing Recent Discovery Productions, attached hereto as **Exhibit A**, ¶11.

Upon receipt of Productions 18, 19 and 21, the undersigned's office reviewed the data to determine what was new or duplicative of prior productions. As a result of this review, many items were identified in Productions 18, 19 and 21 that appeared to not have been included in prior productions. To confirm these findings, undersigned's office sought and obtained confirmation of these findings with the coordinating discovery attorney in this case, Russell M. Aoki ("Mr. Aoki"), who has also confirmed that:

¹ Productions 18 and 19 alone span a range of nearly 47,000 pages at (USA000424152-USA000471033).

1. Production 18 contains 361 media files that appear to not have been previously produced. *Id.* at ¶6.

a. Those 361 new audio files from Production 18 total 1.51 GB in size. This determination was made in part by the examination of the original file names of new media files. *Id.*

2. Production 19 contains 1,122 media files that were not previously produced. *Id.*

a. Those 1,122 new media files total 6.36 GB in size.

3. Other non-media materials were produced within Productions 18 and 19 that could not be matched with a prior bates number to determine whether or not they were previously produced. *Id.* at ¶8.

4. The total materials in Productions 18 and 19 have a total file size of 27.7 GB, and consist of PDFs, Spreadsheets, Powerpoints, text or data files, GPS data files, and “six files requiring specific programs to open”. *Id.* at ¶4.

5. The new media files in Productions 18 and 19 have a runtime length of 45 hours and 16 minutes. *Id.* at ¶7.

6. In total, Productions 18, 19 and 21 contain 1,681 files that are confirmed as not having been previously produced. *Id.* at ¶11.

7. Additionally, the majority of the PDF documents within Productions 18, 19, and 21 lack their original filenames as identifying information. Without that information, they cannot be matched to a prior bates number to confirm whether or not they have been previously produced. *Id.* at ¶11.

8. Production 21 contains ten CSV spreadsheets and 47 Bates-stamped PDF documents that appear to be new. These materials too appear to be new, as the discovery database training attorney was unable to locate these files within prior productions. *Id.* at ¶10.

9. In its Response (DE 985) the Government identified the exact PDF page ranges that constitute the “new” materials. Here, the inverse is also true, that among Productions 18-21 (noting the omission of Productions 17 and 20 and ranges noted as “intentionally left blank”, the undersigned calculates at least 47,000 pages of duplicative data.

10. Among that sea of potentially duplicative data, there are photos, and non-text searchable items in an array of file extensions, which makes an estimation for their review impossible.

11. The Government has represented in its Response to the March 13, 2025 Order that going forward, there would be no more duplicative items in discovery. (DE 985, p. 4).

Dated: March 31, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that a true and correct copy of the foregoing was filed conventionally, under seal on March 31, 2025, and served via email to counsel for the Government; and to counsel for Co-Defendants: Ortiz, Intriago, Solanges, and Sanon.

By: 

Tama Beth Kudman